



THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF  
TELECOMMUNICATIONS & ENERGY**

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COMMISSIONER

August 29, 2002

VIA EMAIL AND U.S. MAIL

Bruce P. Beausejour, Esq.  
Victor D. Del Vecchio, Esq.  
Verizon Massachusetts  
185 Franklin Street, Room 1403  
Boston, MA 02110

Re: D.T.E. 01-31-Phase II (Track A)  
D.T.E.'s Second Set of Information Requests

Dear Messrs. Beausejour and Del Vecchio:

Enclosed please find the second set of questions to Verizon Massachusetts issued by the Department in the above-captioned matter. Please submit Verizon's responses to the Department and the parties in hard copy and by email on or before 5:00 p.m., Monday, September 9, 2002. Should you have any questions, please contact me at (617) 305-3608.

Sincerely,

Paula Foley  
Hearing Officer

Encs.

cc: DTE 01-31-Phase II service list (w/encs.)

## INSTRUCTIONS FOR RESPONSES TO INFORMATION REQUESTS OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to Verizon Massachusetts the following Information Requests.

### **Instructions**

The following instructions apply to the Information Requests issued to all parties in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the petitioner or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:  
  
Provide all data, assumptions, and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term “document” is used in the broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department, and on all Department staff and parties; and submit two (2) copies of the responses to Paula Foley, Hearing Officer.

QUESTIONS TO VERIZON MASSACHUSETTS  
D.T.E. 01-31-Phase II (Track A)  
August 29, 2002

1. See June 5, 2002 Compliance Filing at 5: Verizon proposes to offset the revenue reduction of \$15,925 resulting from the conversion of collocation arrangements provided out of D.T.E. Tariff 10 offerings to D.T.E. Tariff 17 “by an increase in the Residential Dial Tone Line consistent with the revenue neutral approach adopted by the Department for other reductions in wholesale rates.” In the Phase I Order at 103, the Department has stated that it is “persuaded that switched access rates should be reduced to interstate levels, and special access rates should be reduced to UNE-based levels, with the revenue shortfall recovered from fixed charges for residential dial tone lines.” Please explain why the revenue reduction from the conversion of D.T.E. Tariff 10 collocation offerings to D.T.E. Tariff 17 should be offset by an increase in Residential Dial Tone Line rates in the same manner as the revenue shortfall from reductions in switched and special access rates.
2. Please specify every service that Verizon contends is subject to the price floor rules in the Phase I Order, and every service that Verizon contends is subject to the price floor rules from D.P.U. 94-185.